

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DIVISION OF TEXAS, PLANO DIVISION

A.M. WILLIAMS/LEGAL ACCESS

V.

CASE NUMBER: 4:22 cv 104 SDJ/CAN

SERGIO CASTORENO AND BOOKEEPING SERVICES, ET AL.

**VERIFIED COMPLAINT FOR CONVERSION, UNJUST ENRICHMENT, AND
APPLICATION FOR TEMPORARY RESTRAINING ORDER**

COME NOW, Al M Williams, *plaintiff*, on oath and set forth in a manner to be testified to at trial states:

1. That this Court has jurisdiction over these matters.
2. A complaint has been filed against the parties below seeking injunctive relief.
3. The parties are listed below:
 - a. *Al M Williams is plaintiff*
 - b. *Texas Department of Motor Vehicles is Defendant*
 - c. *Oklahoma Department of Motor Vehicles is Defendant*
 - d. *Sergio Casterno is Defendant*
 - e. *Bookeeping Services is Defendant*
4. I am a business owner and the absolute owner and lien holder to a 2006 Lexus IS350 Vin# JTHBE262962003988. This vehicle is subject to illegal title acquisition within the State of Oklahoma.
5. This vehicle has a Texas issued by the State of Texas.
6. A proper demand was made upon Texas Edition Body Shop or return of the property I have diligently sought return of my vehicle along statutory guidelines. The lienholder refuses to cooperate in the retrieval of the vehicle.
7. An application for 42 title was filed and processed against my vehicle on February 10, 2022. This application was erroneous and contrary to applicable law.
8. The lienholder did not comply with statutory law.
9. The plaintiff will suffer irreparable harm without Court intervention.

FILED

FEB 14 2022

Clerk, U.S. District Court
Eastern District of Texas

10. The resulting title will be issued and permanently deprives me of all ownership interest and right to my vehicle and must be cancelled.

WHEREFORE, all premises considered , plaintiff, A.M. Williams, hereby requests a Temporary Restraining Order be issued immediately directing Texas Department of Motor Vehicles and Oklahoma Department Motor Vehicles to prevent irreparable injury and harm.

Relief Requested:

Compensatory Damages in amount of \$10,000.00

Punitive Damages in the amount of \$7,500.00

Injunctive Relief –ORDER that Department of Motor Vehicles places a hold on record until this case is heard in Court of Law.

The statements set forth are accurate, correct, and true to the best of my knowledge, information, and belief pursuant to USC 1746.

Respectfully submitted,

Al M Williams, Plaintiff

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